I, ILAN BUNIMOVITZ, being duly sworn, do depose and state as follows:

DHEL SAWYER 1. I am of legal age. I am a director of Private Media Group, Inc. ("PRVT"). I have personal knowledge of the matters stated below and could testify competently to them if called to do so. This declaration is submitted in support of Plaintiffs' Application for an Order to Show Cause Why Defendant Berth H. Milton Jr. Should Not be Held in Contempt to which it is attached.

- 2. On August 23, 2011, director Eric Johnson was appointed as the Receiver for PRVT by the Eighth Judicial District Court in Clark County, Nevada, in Case No. A622802.
- 3. On or about August 29, 2011, I was informed that PRVT's CEO, Berth H. Milton Jr. ("Milton"), was secretly attempting to transfer the valuable internet domain name "private,com" from the company's name into his own name.
- 4. Upon learning this, I immediately notified Mr. Johnson. After notifying Mr. Johnson, I contacted the internet domain name registrar's customer service, who informed me that there had indeed been "some activity" in the account that day, but that the domain was not removed yet. I was advised to contact the legal department of the registrar in order to prevent any such transfer.
- 5. I then contacted the legal department of the registrar and informed them of the Order appointing Mr. Johnson as Receiver of PRVT and Milton's attempt to transfer the internet domain name "private.com" into his own name.
- 6. On August 29, 2011, the registrar sent me an email confirming that they had placed the internet domain name "private.com" under a legal block to prevent Milton from continuing to try to transfer it into his own name. A true and correct copy of that email is attached to this Affidavit as Exhibit A.

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DECLARATION OF ILAN BUNIMOVITZ, Page 1 of 2

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I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Dated this 9 day of September, 2011.

LAN BUNIMOVITZ

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